

Exhibit G

Robinson, Simon J. (Huntleigh) 2/22/2007 4:02:00 PM

HIGHLY CONFIDENTIAL

UNITED STATES DISTRICT COURT

SOUTHERN DISTRICT OF NEW YORK

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IN RE SEPTEMBER 11 LITIGATION

No. 21 MC 97 (AKH)

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VIDEOTAPED DEPOSITION OF

SIMON J. ROBINSON

Thursday, February 22, 2007

REPORTED BY: SHERRI STARR, CSR# 10245 (03-392094)

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1 A. I do not.

2 Q. Do you know of any security reason why a
3 three-inch Swiss Army knife would not be able to do
4 the same damage as a box cutter?

5 MR. TOMASIK: Objection.

6 THE WITNESS: I do not.

7 MR. ROSS: Q. Can you give us any
8 security reason why the FAA made these distinctions
9 with regards to knives and sharp instruments as to
10 why some were allowed through and others were not?

11 MR. SCHOLZ: Objection to form, legal
12 conclusion.

13 THE WITNESS: I do not know of any reasons
14 as to why that determination was made on blade size
15 or distinction of knife type.

16 MR. ROSS: Q. Okay. Let's talk about
17 inside the sterile area for a second. You're
18 familiar with the sterile area on the other side of
19 the checkpoint that you ran in Boston up until
20 August of 2001, right sir?

21 A. That is correct.

22 Q. And let's talk about it as of that time,
23 not as of now. Are you aware of any places where
24 somebody who had passed through the checkpoint could
25 then obtain a knife --

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1 MR. SCHOLZ: Objection.

2 MR. ROSS: -- inside the sterile area?

3 THE WITNESS: I believe that there's a
4 number of places that they could have obtained one.
5 I do not believe they could have gotten one from
6 Burger King but I do believe that they could have
7 gotten one from the Red Carpet Club that provides a
8 similar type of service as this room does with
9 cutlery, crockery, stuff like that to serve its
10 first-class passengers and business club members.
11 It's a possibility, yes.

12 MR. ROSS: Q. Okay. That's one place,
13 you said there were a number of places. What other
14 places might someone, a terrorist or otherwise, have
15 been able to obtain a knife?

16 A. There was one situation, and I do believe
17 there was another bar and restaurant on the
18 right-hand side of the terminal. I can't remember
19 because the terminal has changed a lot over the
20 years since then.

21 It was actually under construction while I
22 was there and that brings me to my other case in
23 point that there's a possibility that workmen that
24 worked in the area rebuilding that concourse had
25 tools available to them that could have been

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1 obtained by a passenger. I can recall several times
2 when they were re-installing the wall and ceiling to
3 one of the terminals that tools were all over the
4 place in that particular area being used to help
5 with the construction of that area.

6 MR. ROSS: Q. Was the restaurant that you
7 just mentioned, was that completed by the time you
8 left in August of 2001?

9 A. That's the one I don't remember much
10 about. I believe it was on the right-hand side.
11 There was a Hudson News magazine and gift store on
12 the left-hand side. This, as I remember rightly, I
13 think this bar/sandwich-type setup was on the
14 right-hand side of the terminal but I could be
15 wrong, that's one I'm not clear on.

16 Q. So you're not clear on whether the
17 restaurant was completed prior to your leaving or
18 not?

19 A. Correct.

20 Q. Okay. Have you ever eaten in the
21 restaurant?

22 A. Yeah.

23 Q. Were knives available in the restaurant
24 when you were there?

25 MR. SCHOLZ: Objection.